

**REMARKS**

In the Office Action mailed August 23, 2006, the Examiner acknowledged the election of claims 1-6; objected to the specification; rejected claim 2 under 35 U.S.C. §112, first paragraph, for failing to satisfy the written description requirement; and rejected claims 1-6 under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 6,999,956 to Mullins.

By this Amendment, Applicants amend claims 1 and 2 to more clearly define the features of the present invention.

Regarding the objection to the specification and the rejection under 35 U.S.C. § 112, Applicants submit that the amendments to claim 2 obviate the basis for the objection to the specification as well as the rejection of claim 2 under 35 U.S.C. §112, first paragraph. Claim 2 is thus in immediate condition for allowance.

**Rejection under 35 U.S.C. §102(e)**

The Examiner rejected claims 1-6 under 35 U.S.C. §102(e) as anticipated by Mullins. Applicants respectfully traverse this rejection.

Claim 1 defines a system for enabling a Meta Object Facility (MOF) compliant service for a metadata resource. Moreover, claim 1 includes a combination of elements including, among other things, "a metamodel repository storing one or more MOF models defining metadata from the metadata resource accessible via the resource-specific application programming interface," and "a persistence interface between the connector and the metamodel repository, configured to instantiate via the resource-specific application programming interface at least one MOF compliant service for the connector based on one of the MOF models in the metamodel repository."

Mullins allegedly discloses a system for dynamic object-driven database manipulation and mapping which correlates or translates one type of database to another type of database or to an object programming application. Mullins describes correlation or translation as involving a relational to object translation, an object to object translation, a relational to relational translation, or a combination of the above. In short, Mullins primarily addresses the problems associated with dynamic mapping of databases to selected objects, and does not address a Meta Object Facility (MOF) compliant service.

The Examiner appears to allege that Mullins at FIG. 6 discloses the claimed “metamodel repository” and the “persistence interface” recited in claim 1. The description of FIG. 6 reveals that Mullins is silent with respect to the above-noted features of claim 1. Specifically, Mullins describes FIG. 6 as follows:

FIG. 6 is a diagram depicting the comprehensive operation of the present invention that combines all of the components described in FIGS. 2-5, or lists them as options within the diagram. This diagram shows a system having both a DataSource Relational DataBase and an Optional Object Database DataSource, as well as an Optional CocoBase Data Migration Tool. This migration tool can migrate and translate data between each of an Object database, a Relational database, an XML storage file, and a flat text file XML file. An optional migration tool has the ability to migrate and translate to and from a UML format and an XMI format. Other system components have been described further in FIGS. 2-5. Also, how to implement or remove various components in a system as shown in FIG. 6 is further described below in the detailed description of the invention.

Mullins, col. 7, lines 32-45. As demonstrated by the above passage, Mullins fails to disclose a Meta Object Facility (MOF) compliant service. Nor does Mullins disclose or suggest a metamodel repository storing one or more MOF models defining metadata

from the metadata resource accessible via the resource-specific application programming interface. Accordingly, Mullins fails to disclose at least the following element of claim 1: "a metamodel repository storing one or more MOF models defining metadata from the metadata resource accessible via the resource-specific application programming interface." Claim 1 is thus not anticipated by Mullins, and the rejection under 35 U.S.C. §102(e) of claim 1 and claims 2-6, at least by reason of their dependency from independent claim 1, should be withdrawn.

Moreover, the Examiner appears to allege that the "CocoBase Object Model Repository" discloses the claimed "metamodel repository storing one or more MOF models." However, Mullins' CocoBase Object Model Repository is described as merely "an optional CocoBase Object Model Repository file, which may be stored as stand alone files, in an Object or Relational data source, or an XML repository." Mullins, col. 7, lines 12-15. Accordingly, Mullins lacks any disclose regarding the above-noted features of the claimed "metamodel repository." Since Mullins lacks the claimed "metadata repository" Mullins cannot possibly disclose the claimed "persistence interface." Indeed, the Examiner does not even appear to allege that Mullins discloses the claimed "persistence interface." Mullins thus fails to disclose at least the following element of claim 1: "a persistence interface between the connector and the metamodel repository, configured to instantiate via the resource-specific application programming interface at least one MOF compliant service for the connector based on one of the MOF models in the metamodel repository." For this additional reason, claim 1 is thus not anticipated by Mullins, and the rejection under 35 U.S.C. §102(e) of claim 1 and

claims 2-6, at least by reason of their dependency from independent claim 1, should be withdrawn.

Regarding claim 3, the Examiner alleges that Mullins at column 17, lines 38-40 or columns 12, lines 35-40 discloses "the MOF compliant service is a Java Metadata interface (JMI) service." Applicants disagree and submit that the cited passages clearly lack any disclosure regarding the noted features of claim 3. If the Examiner is relying on Official Notice, Applicants submit that the Examiner "must provide an affidavit or declaration setting forth specific factual statements and explanation to support the finding." See M.P.E.P. 2144.03. For this additional reason, claim 3 is thus not anticipated by Mullins, and the rejection under 35 U.S.C. §102(e) of claim 3 should be withdrawn.

Regarding claim 5, the Examiner alleges that Mullins at column FIG. 6 discloses "the metamodel repository includes a repository server configured to generate code for the MOF compliant service." Applicants disagree and submit that FIG. 6 lacks any disclosure regarding the noted features of claim 5. If the Examiner is relying on Official Notice, Applicants submit that the Examiner "must provide an affidavit or declaration setting forth specific factual statements and explanation to support the finding." See M.P.E.P. 2144.03. For this additional reason, claim 5 is thus not anticipated by Mullins, and the rejection under 35 U.S.C. §102(e) of claim 5 should be withdrawn.

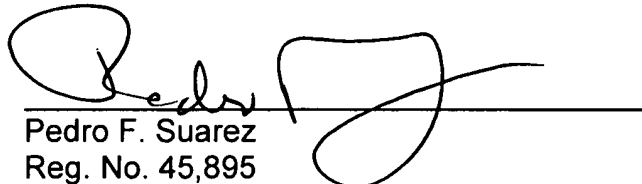
**CONCLUSION**

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below. No fee is believed to be due, however, the Commissioner is hereby authorized to charge any fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-089.

Respectfully submitted,

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